



MEMO ENDORSED

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April 7, 2006

VIA FEDERAL EXPRESS

The Honorable Stephen C. Robinson
United States Courthouse
300 Quarropas Street, Room 633
White Plains, New York 10601-4150

Re: Serin et al. v. Northern Leasing Systems, Inc., et al., No. 06 Civ. 1625 (SCR)

Dear Judge Robinson:

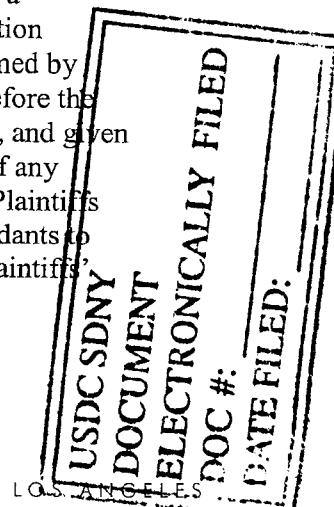
My firm represents all of the defendants in the above matter. In accordance with the Court's Notice, dated March 7, 2006, enclosed please find Defendants' proposed Civil Case Discovery Plan and Scheduling Order and attachment thereto. The parties have conferred regarding the proposed scheduling order and, as of Defendants' counsel's last email communication with Plaintiffs' counsel yesterday (which has not been answered by Plaintiffs' counsel), have not been able to reach agreement on a joint proposed order.

We have submitted the proposed scheduling order despite our belief that the complaint in its entirety should be dismissed at the pleading stage. With respect to the timing of the filing of Defendants' motion to dismiss the complaint, we request that the Court extend the time for Defendants to move to dismiss the complaint to June 12, 2006 (30 days after the initial case management conference currently scheduled for May 12, 2006). On March 30, 2006, the Court entered the Stipulation and Order Extending Time to File a Responsive Pleading and Setting a Briefing Schedule (the "Stipulation and Order"), which extended Defendants' time to file a responsive pleading until April 28, 2006 given that the Court had not scheduled a pre-motion conference with respect to Defendants' prospective motion to dismiss. I have been informed by Your Honor's law clerk that the Court does not intend to hold a pre-motion conference before the initial case management conference is held on May 12, 2006. In light of that information, and given Your Honor's individual practice of requiring a pre-motion conference before the filing of any dispositive motion, Defendants' counsel contacted Plaintiffs' counsel and requested that Plaintiffs agree to an amended stipulation and proposed order that would set the deadline for Defendants to move to dismiss the complaint after the May 12th initial case management conference. Plaintiffs' counsel refused that request.

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Defendants are now in the position of not being able to comply with both the Stipulation and Order and the Court's requirement that a pre-motion conference precede the filing of any motion to dismiss. Defendants therefore request that the Court extend Defendants' time to answer or move to dismiss the complaint to June 12, 2006. In the alternative, Defendants request that the Court waive its pre-motion conference requirement and Defendants will file their motion to dismiss on April 28, 2006, as per the terms of the current Stipulation and Order.

Respectfully Submitted,

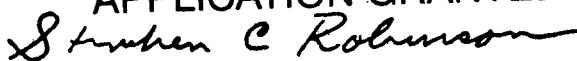


Peter Sloane

Enclosure

cc: Krishnan Chittur, Esq. (Counsel for all plaintiffs) (Via Email and FedEx)
SDNY Orders and Judgments Clerk (Via Email)

APPLICATION GRANTED



HON. STEPHEN C. ROBINSON

4/16/06